

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

IN RE RICHARD M. OSBORNE SR.
Debtor

CASE NO. 17-17361
CHAPTER 11
JUDGE ARTHUR I. HARRIS

**MOTION TO RESCHEDULE HEARING ON FIRST NATIONAL BANK OF
PENNSYLVANIA'S MOTION TO APPOINT A CHAPTER 11 TRUSTEE AND FOR AN
EXTENSION OF TIME TO CONDUCT DISCOVERY**

Richard M. Osborne, Sr., as debtor and debtor-in-possession herein, (the "Debtor") hereby move this Court for entry of an order pursuant to Federal Rule of Bankruptcy Procedure (the "Bankruptcy Rules") 2002 to reschedule the hearing on First National Bank of Pennsylvania's Motion to Appoint a Chapter 11 Trustee [Doc. 308] ("Motion") currently set for April 16, 2019 and to extend the deadline to conduct discovery from March 15, 2019. The Debtor has just filed a motion to employ special counsel and these issues will be complex and will require a full evidentiary hearing. The Debtor, therefore, needs additional time to bring special counsel up to speed and to prepare for the hearing. (It took an unexpected amount of time to find special counsel with the requisite skills and without connection to the Debtor, his companies or one of the creditors to this case). In addition the parties have been discussing a resolution of their dispute and additional time may assist them in reaching a settlement.

The Debtor requests a 60 day extension of time, until May 14, 2019, to conduct discovery and a similar 60 day extension of the hearing date to a date available to the parties.

WHEREFORE, Debtor respectfully requests that the Court enter an order granting the relief requested hereby and such other and further relief as to which he is entitled.

Respectfully submitted,
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CERTIFICATE OF SERVICE

I hereby certify that a copy of this Motion to Reschedule was electronically transmitted on or about the date filed via the Court's CM/ECF system to the following who are listed on the Court's Electronic Mail Notice list or was served by U.S. mail, postage prepaid, or certified mail on the persons below as indicated below.

Electronic Mail Notice List

The following is a list of the parties who are on the list to receive e-mail notice/service for this case:

17-17361 Notice will be electronically mailed to the U.S. Trustee, and:

Gregory P. Amend on behalf of Creditor First National Bank of Pennsylvania
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/s/ Frederic P. Schwieg
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